



Department of Code Enforcement

**Indianapolis**

Gregory A. Ballard, Mayor

## **NOTICE OF REVIEW**

### **4<sup>th</sup> Review – Interior Build-out Amendment**

January 18, 2012

TO: Stephen Hoffman

RE: 201 N Shadeland, Indianapolis ROC, **Str11-02900**

A review of your submittal regarding the above referenced structural permit application has been completed by the Department of Code Enforcement. Plans and specifications must reflect compliance with all applicable building laws in accordance with Building Standards and Procedures Section 536-205(f)(2).

Based upon our review we have concluded that the items below do not meet minimum requirements or are in need of further supporting documentation.

1. **Resolved.** A manual fire alarm system shall be installed in Group B occupancies having an occupant load of 500 or more persons or more than 100 persons above or below the lowest level of exit discharge.

InBC 907.2.2

Based upon the occupant load calculations provided, no considerations were made for the conference and/or assembly areas of the first floor. The occupant load for the first floor exceeds 500 occupants and a fire alarm system is required to be installed on the first floor.

Response Received 11/20/2012: The small conference rooms and the roll call are included in the 100 sf gross because the code is set up to utilize conference rooms as part of the "B" occupancy category and do not need to be calculated separately as they are "dual use", i.e. the people in the conference rooms are the same people as the office people and should not be counted for occupancy load.

Additional Comment: Per 1004.1.1 of the Indiana Building Code, the occupant load shall not be less than that number determined by dividing the floor area under consideration by the occupant per unit of area factor assigned to the occupancy. You will note that there is an exception to this section for the "actual number" of occupants to be used, which correlates to the response of the occupants of the office to be the only ones occupying the conference rooms. However, that section has been amended out of the

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7/29/2010

Indiana Code and may not be utilized in determining an occupant load. The occupant load is over the threshold for requiring a fire alarm throughout the first floor.

Response received 12/6/2012: The loading of the space on the first floor has been recalculated to be 454...please see A2.1...also please note that the community room has been fire alarmed and horn/strobes added due to potential occupant loading and is not part of the 454 "area calculation" as it is a "B" to "A" separated occupancy... 1 hr, fully sprinklered... see page A 2.1

Additional Comment: The occupant load for the B occupancy portion of the building was incorrectly calculated. If you reference the occupant load Table in the Building Code (Table 1004.1.1), there are two type of factors in that table: net and gross. I have attached some code commentary to this review notice that further explains the difference between them, but the gross calculation does not allow for the removal of corridors, restrooms, etc from the occupant load calculation. The business occupant load factor is a gross calculation factor. The net calculation factor allows you to eliminate those and similar spaces from the occupant load calculation.

Occupant Load Calculations:

Originally proposed B area:	48,945
Minus rooms 348 & 349:	(4,640)
Minus accessory assembly spaces	(1,748)
	= 42,560 / 100 = 426 occs

Accessory Assembly Spaces 1,748 / 15 = 117 occs

Rooms 348 & 349 = 4640 / 15 = 310 occs

Accessory Storage areas and mechanical equipment rooms 2690 / 300 = 9 occs

**Total load for 1<sup>st</sup> floor = 426 + 117 + 310 + 9 = 862 occupants**

See additional comments below regarding the 1 hour separation between the A and B occupancies and ISO SFO requirements.

Response Received 12/17/2012: Even though we disagree with the City of Indianapolis' interpretation of the codes involved, we have decided to add horn strobes per the attached sheet E12 as this is something we were going to do as part of the next phase anyway.

- 2. Resolved.** Each room or space with an occupant load of 50 occupants or more shall be provided with 2 exits.

InBC 1015.1

The plans show a folding partition that would separate rooms 349 and 352. When open, the exiting from the space is adequate. However, when closed you would only

have 1 exit from Community Room 349. Using a load factor similar to a conference room, the community room would require two exits.

Response Received 11/19/2012: Folding partition is not being installed.

Additional Comment: Plans submitted for review need to clearly reflect the scope of work. If the partition is not being installed, that should resolve the concern, but this must be reflected on the plans submitted for review.

Response Received 12/6/2012: A 2.1 dwgs show the new plan without a folding partition. RM has two exits

**3. Not Resolved.** Where plumbing fixtures are provided, they must be accessible.

InBC 1109.2

Clearance requirements around fixtures are not being met in Shower 131 or RR 132.

Response Received 11/19/2012: Clearance requirements were not an issue as the city HC consultant rates this facility as "not open to the public" and therefore does not need to be ADA accessible.

Additional Comment: The Indiana Building Code does not provide exception from designing to accessibility standards because the building is not open to the public.

Response Received 12/6/2012: Per Indiana amendments HC bathrooms are not required see attached P. 5 of 27

Additional Comment: This code section provides the exception to allow this section of the basement to not be served by an elevator. It does not exempt the basement or features within the basement floor from complying with the other accessibility requirements contained in Ch. 11.

Response Received 12/17/2012: Per Section 2905 of IBC we have provided toilet facilities within 500 ft and are therefore going to eliminate access to the restrooms in the basement area. Since they are no longer provided they will not be required to be accessible.

Additional Comment: I am not following the response. Are you removing the plumbing fixtures in the basement level? If so, please make any adjustments on the plans.

**4. Resolved:** Sheet A9 of the plans indicates multiple wall types. I do not see indication on the floor plans that reference these specific wall types.

GAR 675 IAC 12-6

Please indicate wall types on the plans.

Response received 11/19/2012: The difference was types are a result of stud thickness OSE or insulation ...All walls are constructed with 5/8 type drywall both sides for Type "A" construction.

Additional Comment: No revised plans received as requested. I am unable to follow this response and am unclear on what Type A construction is?

Response received 12/6/2012: See sheets (DWGS)A8, A8.1, A9. Type "A" is old designation from 1 Hr.

5. **Resolved:** Fire and life safety plan required that show graphically or by legend the location and rating of building elements, such as area separation walls, smoke barriers, stair enclosures, etc.

GAR 675 IAC 12-6

No indication of fire-resistive construction made on the plans. Please clarify if any fire resistive construction is used in the design.

Response Received 11/19/2012: No response received.

Additional Comment: None.

Response Received 12/6/2012: See Sheets (DWGS) A8, A8.1, A9

Additional Comment: No life safety plan received. Additional comments below based upon other responses provided.

Response Received 12/17/2012: Life Safety Plan See LS1 & LS2

6. **Not Resolved.** If hardware sets being used comply with panic hardware requirements, please note on the plans.

InBC 1008.1.9

Response Received 11/19/2012: No response received.

Additional Comment: None.

Response Received 12/6/2012: See Sheets (DWG ) A8, A8.1, A9

Additional Comment: Drawings do not indicate locations where panic hardware will be installed.

Response Received 12/17/2012: Panics are shown on Rev A3 DTD 16DEC12

Additional Comment: If doorways 349, 352, & 352A are being provided with a latch/lock, it must be panic hardware.

**7. Resolved.** Provide the intended use for the Community Room (Room 128)

InBC 1004.1.1

Response Received 11/19/2012: There was a lot of confusion as to the use of this space. The city wanted to be proactive and provide some community oriented space but, due to the secure nature of the facility and confidential information displayed (the real use for this space is roll call). The community room idea was expanded.

Additional comment: First, I want to clarify that my inquiry was related to the community resource room (Room 128) on the lower level, not the Community Room (349) on the first floor. In regards to Room 128, I need to know how this room is used to ensure proper exiting is provided from the space. If this space is being used for assembly purposes (large meetings for roll call, etc), than another exit will need to be provided and the exit doors will need to swing in the direction of egress.

Response Received: This room is only used for a catch all space to include police equipment, community pride display equipment, training aids & Training equipment....no personnel are using this room

**8. Resolved.** Corridors shall not serve as return air ducts.

InBC 1017.4/1017.4.1

Return air grills shown in corridor walls in Building E lower level. Utilization of the corridor above ceiling space is allowed when multiple conditions are complied with. Please provide additional detail/explanation upon how compliance is being met.

Response Received 11/19/2012: No response received.

Additional Comment: None.

Response Received 12/6/2012: All return air grilles have been removed from 1 HR. corridor

Additional Comment: Not all return air grilles have been removed from corridor walls on the basement plans. See below for additional comments.

Response Received 12/17/2012: See M1. I missed one on the revised plan DTD 26NOV12 corrected on plan DTD 16DEC12.

**9. Resolved.** Comcheck reports for interior lighting and for the mechanical systems are required to be submitted.

InECC Section 5.7.1

Response Received 11/19/2012: No response received.

Additional Comment: None.

Response Received 12/6/2012: Com Checks are attached....Note: This project was divided into 2 parts thus 2 different, separate Com Checks.

- 10. Resolved.** The building owner or occupant shall not make changes in the occupancy without compliance with the applicable rules of the Commission

NFPA 25 Section 4.15.1

In the sprinkler documents provided, there are many areas of the building that are indicated as being existing sprinklered areas. Please provide a statement that these areas have been evaluated for compliance with the new proposed occupancy and do not require any additional modifications for compliance with the current rules of the Commission.

Response Received 11/19/2012: No response received.

Additional Comment: None.

Response Received 12/6/2012: All areas of the new occupancy have been evaluated for compliance with the new occupancy and do not require any additional modifications for compliance with the current rules of the Commission.

- 11. Resolved.** Cover sheet references a sheet A11 & A12 (Reflected Ceiling Plans). These were not provided with the submittal.

Response Received 11/19/2012: No response received.

Additional Comment: None.

Response Received 12/6/2012: Sheets A11 & A12 are attached.

**Additional Comments Based Upon New Information and Responses Provided:**

- 12. Partially resolved.** Fire rated assemblies shall be determined in accordance with test procedures set forth in ASTM E 119.

InBC (2008) 703.2

Provide UL assembly numbers or similar tested assembly

- A to B fire barrier separation, **See UL U419.** Based upon some of your other responses, I am unclear the exact boundary along rooms 349 & 352 that

will be constructed as a fire barrier. Please clearly indicate where that separation will occur. All penetrations and openings within the separation will be required to comply.

- Corridor walls, **Not Req'd to be rated**. It is agreed that the corridor walls are not required to be rated. You had indicated this on the plans. As shown on the documents, they are not meeting the requirements of a 1 hour separation.
- Basement corridor ceiling, **Not Req'd to be rated but separated from plenum**. Agreed, you had indicated the 1 hour rating in a previous response.
- And any other rated assembly utilized in this project as requested multiple times in a life safety plan. **No other rated assemblies req'd.**

Response Received 12/17/2012: **Above**

Additional Comment: **Above**

**13. Not Resolved.** Doors in fire rated assemblies shall be protected in accordance with Table 715.4

InBC (2008) Table 715.4

Door schedule provided does not include any information on required ratings.

Response Received 12/17/2012:

- The doors at RM 349/352 go to non-rated corridor & are not req'd to be rated.
- 348 (Break Rm) is considered to be part of 349 & is separated from "B" Occupancy by wall type W-2 (1 hr) & therefore is not req'd to be rated.

Additional Comment: This is not correct. Doors in rated assemblies must be rated in accordance with Table 715.4

**14. Resolved.** Ductwork that penetrates fire rated assemblies must provided be provided with fire dampers.

InBC (2008) Table 716.3.1

Please indicate on plans for ducts penetrating the A to B separation and any other rated assemblies as indicated on the required life safety plan.

Response Received 12/17/2012: Fire Damper will be added in S. Wall of Rm 352, See M-2

**15. Resolved.** Sheet A1.1 indicates ISO SFO Specifications. Section 8 indicates that all buildings described in the SFO shall have a building-wide fire alarm system designed in accordance with the requirements of NFPA 72. Manual fire alarm stations shall be installed on each floor of occupancy in accordance with the spacing requirements of NFPA 72.

This specification requirement is not being met.

Response Received 12/17/2012: Manual pull stations added on E-11 & E12 one @ each exit.

- 16. Resolved.** Mechanical ventilation shall be provided by a method of supply air and return or exhaust air. The amount of supply air shall be approximately equal to the amount of return and exhaust air.

InMC (2008) 403.1

No return air grills shown in many rooms of the basement. In addition, other rooms on the first floor do not show return air grills.

Response received 12/17/2012: All return in basement is open ceiling, no returns in smoke protected hallways.

All returns in 1<sup>st</sup> floor area are shown. Areas with no returns are store rooms, elec. rms & toilet areas which have exhaust fans to roof or could make smoke during a fire which does not need to be introduced into hvac system (even tho there are smoke detectors in each unit which shuts off air flow in the event of a fire)

- 17. Resolved.** Plenums shall be limited to one fire area.

InMC (2008) 602.1

I am unclear how the return air is being taken from 349 & 352 since the walls surrounding the space must extend to the deck, and it appears on the plans that the above ceiling space is serving as the plenum. This fire area plenum must be ducted, please clarify.

Response Received 12/17/2012: R.A. duct and F.D. shown on M-2

- 18. Resolved.** The air removed by every mechanical exhaust system shall be discharged outdoors.

InMC (2008) 501

Exhaust ducts for bathroom exhaust fans are not shown on the plans.

Response Received 12/17/2012: Added note to M-1 & M-2 " All e-fans shall be ducted to exterior.

Your project will remain on hold pending submission of your written response and 2 sets of revised plans. After we have completed the review of your response you will receive written notice of our determination as well as further instruction.

If after reviewing comments provided- you disagree or need further clarification, you may contact me to discuss or request a meeting at (317) 327-4176 or [mark.sinsko@indy.gov](mailto:mark.sinsko@indy.gov).

Additional options for resolving outstanding issues may include one or more of the following:


- Apply for a variance through the Indiana Fire Prevention and Building Safety Commission per 675 IAC 12-5; Department of Homeland Security, 200 W. Washington, Room W246, Indianapolis IN 46204, 317.232.3835, [www.in.gov/dhs/](http://www.in.gov/dhs/)
- Request a review through the Indiana Fire Prevention and Building Safety Commission per IC 22-13-2-7; Department of Homeland Security, 200 W. Washington, Room W246, Indianapolis IN 46204, 317.232.3835, [www.in.gov/dhs/](http://www.in.gov/dhs/)
- Request an interpretation of building law through the Indiana Department of Homeland Security per IC 22-13-5; Department of Homeland Security, 200 W. Washington, Room W246, Indianapolis IN 46204, 317.232.3835, [www.in.gov/dhs/](http://www.in.gov/dhs/)

Additional holds that must be satisfied prior to the issuance of this permit include:

- Construction Design Release from the Indiana Department of Homeland Security.
- Payment of plan review and permit fees

Questions regarding additional holds may be directed to (317) 327-8700 or [permitquestions@indy.gov](mailto:permitquestions@indy.gov).

Sincerely,



Mark Sinsko  
Chief Building Code Analyst  
Department of Code Enforcement  
City of Indianapolis – Marion County